### West Virginia Department of Environmental Protection Division of Air Quality

## **Fact Sheet**



# For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on June 12, 2018.

Permit Number: R30-06100134-2018 Application Received: September 20, 2018 Plant Identification Number: 03-54-061-00134

Permittee: Longview Power, LLC Facility Name: Longview Power Plant

Mailing Address: 1375 Fort Martin Road, Maidsville, WV 26541

Permit Action Number: MM01 Revised: January 15, 2019

Physical Location: Maidsville, Monongalia County, West Virginia

UTM Coordinates: 589.2 km Easting • 4395.7 km Northing • Zone 17

Directions: From Morgantown, take WV Route 19 West to Route 100 North to

Route 53 (Fort Martin Road). Proceed 5.4 miles. Turn left into Gate 2.

Proceed to security.

#### **Facility Description**

Longview is an electric generating unit and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of a 6,114 MMBtu/hr pulverized coal fired boiler, steam turbine generator, and a natural gas fired auxiliary boiler, with associated equipment including coal, limestone, and ash handling, a cooling tower, an emergency generator, and a fire pump. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year.

This minor modification incorporates the requirements of the recently issued permit R14-0024G which is to allow for the use of other approved monitoring methods and/or procedures under 40 CFR 63 Subpart UUUUU (MATS Rule) to continuously monitor mercury (Hg) emissions discharged from the PC Boiler.

#### **Emissions Summary**

There are no changes in potential emissions associated with this minor modification.

#### **Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 2,954 tons per year of CO, 2,418 tons per year of SO<sub>2</sub>, 1,755 tons per year of NO<sub>x</sub>, and 422 tons per year of PM<sub>10</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Longview Power, LLC's Longview Power Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

#### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

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	45CSR13	Permits For Construction, Modification, Relocation And
		Operation Of Stationary Sources Of Air Pollutants,
		Notification Requirements, Administrative Updates,
		Temporary Permits, General Permits, And Procedures For
		Evaluation
	45CSR34	Emission Standards For Hazardous Air Pollutants
	40 C.F.R. Part 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants:

Coal- and Oil-Fired Electric Utility Steam Generating Units

State Only: N/A

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 et seq., 45CSR16, 45CSR34 and 45CSR30.

#### **Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)	
R14-0024G	October 12, 2018		

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

#### **Determinations and Justifications**

Conditions 5.1.9., 5.2.1.e. and 5.5.4. have been revised to match the requirements in permit R14-0024G issued on October 12, 2018 as follows:

- Conditions 5.1.9. and 5.2.1.e. have been revised to allow for flexibility in the use of Hg emissions monitoring methods (e.g., sorbent trap monitoring and/or LEE testing) as allowed in 40 CFR 63 Subpart UUUUU (MATS Rule) instead of requiring Hg CEMS as the only means for compliance.
- Condition 5.5.4. has been revised to remove the Hg CEMS quarterly emissions report. The MATS Rule requires semi-annual excess emissions reports.
- ➤ Condition 5.5.15. Although the requirements of this condition are not from R14-0024G, this condition has been revised to add "as applicable" in the first set of parentheses in the first sentence.

#### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

N/A

#### Request for Variances or Alternatives

None.

#### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

#### **Comment Period**

Beginning Date:

Not Applicable for minor modifications.

Ending Date:

N/A

#### **Point of Contact**

All written comments should be addressed to the following individual and office:

Frederick Tipane

West Virginia Department of Environmental Protection

Division of Air Quality

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Charleston, WV 25304

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#### Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

#### **Response to Comments (Statement of Basis)**

Not applicable.